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4 AUG 1976
ISG/DIM-76/81

MEMORANDUM FOR: Deputy for Information Systems
Deputy for Information Processing

THROUGH : Chief, Information Services Group

25X1 FROM :
Deputy for Information Management

SUBJECT : Requirements for Recording Declassification and
Sanitization Actions in the DDO Records System

ACTION : See Paragraphs 3 and 4

1. Policy - It is the responsibility of Information Services Group to record in the DDO records system declassification or sanitization actions taken on DDO-originated documents as a result of processing activities under the Freedom of Information Act, the Privacy Act, and the long range declassification review project (30 year old documents) as required by Executive Order 11652.

2. Background

A. Current Method for Recording. Currently there is no consistent or complete method for recording declassification or sanitization actions taken on DDO documents. It was first thought that the most accurate means would be to record either of the actions on the record copy of the document. Not only would this method be extremely time-consuming (locating the record copy), but it would not insure complete accuracy. Many documents surfaced as a result of FOIA or Privacy Act requests (and particularly those declassified under the declassification-review project) might not be in the record system to begin with thus there would be no record copy. A record copy would have to be created, therefore, to record the declassification or sanitization action, then a file created to hold that record copy. Collections of unnecessary files would be generated. Another problem with recording declassification/sanitization action on any hard-copy document (record copy or otherwise), is that the action would have to be recorded on all copies if the recording is to be completely effective. A notification system of some kind would have to be devised to insure that all copies (including the record copy) are located when declassification/sanitization action is taken so that the action

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can be indicated on each copy. This would be a time-consuming if not an impossible task, and there would always be the risk that all copies could not be located. If a copy not located surfaced in another request there would be no declassification/sanitization action recorded on it, therefore it would have to be reviewed again, and the second review could result in a different action being taken.

B. Suggested Method for Recording. The Abstract File of the DDO Records System serves as the official record not only of documents in the system but to record actions taken (file location, destruction, etc.) on those documents. It seems logical, therefore, that declassification or sanitization action affecting DDO-originated or documents from any source in the DDO system be recorded in the abstract file. To do so would eliminate the need to record declassification/sanitization action directly on record copies and no special files would have to be established to hold those documents not now in the system and for which no record copies exist. Further, there would be no special method required to notify all recipients (addressees) of a particular document to record declassification/sanitization action on their copies because that information would be recorded and available through the central file system (i.e., the Abstract File). FOIA and Privacy Act researchers, therefore, would be able to search the abstract file to determine if any action had been taken on documents they may have retrieved in response to a request. The search would take place before their document review process thereby eliminating the possibility of duplicative review action being taken.

If a researcher finds in the abstract search that declassification/sanitization action has not been taken on a document or that a document is not in the DDO records system, he or the document originator would be required to report the action to ISG for recording when and if such action is taken. Document declassifiers involved in the 30 year review project would not be required to perform abstract checks prior to review for declassification but would be required to report that action once it is taken.

3. Recording/Retrieval Requirements. The requirements which follow assume recording and retrieval of declassification/sanitization actions in the abstract system. In the event that DIS study (paragraph 4., below) finds that direct recording in the abstract file is not feasible or possible, the recording/retrieval requirements still apply to any alternate system developed.

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A. INPUT

1) Accept document reference information and declassification/sanitization actions for documents not currently in the records system. The type of document reference information required will be the same as that required for an abstract record except in those cases when a document is not currently in the system and will not be filed in an official file after the declassification or sanitization has been taken. In this case the file locator information will not be required.

2) Accept adds and updates of declassification/sanitization actions to records for documents already in the system.

B. STORAGE

The data to be stored concerning document identification will be the same as that required for an abstract record (except as noted in A, 1), above). Declassification/sanitization information required is:

TYPE ACTION: DECLASSIFIED or SANITIZED FOR RELEASE*

ACTION AUTHORITY: Name and/or Number of the declassifier or reviewer.

DATE OF ACTION

*Note: If the document is sanitized, the IPS case file number may be required to aid in future referrals.

C. RETRIEVAL

It is desirable that legends such as: DECLASSIFIED or SANITIZED FOR RELEASE be printed on index records whenever the document is surfaced in a Name Trace*. The legends should also be provided (displayed or printed) whenever an abstract search is made or when a File Content Listing is required. There should also be an "upon request" capability for producing the complete declassification/sanitization information as described in B., above.

*Note: Although retrieval and printing of the declassification/sanitization legends through the Name Trace System is a highly desired capability, it is not absolutely essential. The dis-

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advantage of not having this capability is that name tracers doing searches for FOIA, Privacy Act, or other requests for outside release would have to do a separate abstract search on the documents surfaced in the name trace.

D. EXTERNAL (procedural) REQUIREMENTS. Procedures (DOIs and ISG) will have to be developed to describe user responsibility for the searching for and the input of declassification/sanitization information. Procedures must include instructions and responsibility for:

1) Performing declassification/sanitization checks on documents prior to taking review or release action.

2) Reporting declassification/sanitization actions to ISG for recording in the system.

3) Notifying the office of record* when prior sanitization action on a document has been surfaced to insure that the same version is released in response to a second or different request.

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4. Action Required

A. DIS - Initiate a study to determine the feasibility of adapting the Abstract System to allow input, storage, and retrieval of declassification/sanitization actions per the requirements in paragraphs 3,A., B., & C., above.

If the study proves that changes to the Abstract System are not feasible or possible, an alternate recording system should be recommended. If that system requires that declassification/sanitization information be stored separately from the abstract information (file), it should not, if possible, be apparent to the external user when he submits a request through the abstract system. The implications of this requirement are obvious: there would have to be a link of some kind between the abstract system and the separate or special declassification/sanitization information, and the point of access for the information would be through the abstract system. Of course, what-

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ever means taken to record the information will depend upon what is reasonably possible and cost effective.

Please provide an estimate of the time required for study and implementation. Concerning that estimate, DIS is advised that the group responsible for review of 30-year old Agency documents is scheduled to commence operations around mid-October 1976. When advised of tentative implementation scheduling by DIS, DIM will be prepared to assign an analyst to prepare the necessary user procedures.

B. DIM - assign an analyst to study and develop the procedural requirements as described in paragraph 3.D., above.

C. DIP - until such time as DIS completes the necessary systems changes or development in the Abstract System, DIP may want to examine the possibility of establishing a temporary system for capturing declassification or sanitization actions currently being taken on DDO documents.

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